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April 20, 2004

Mr. Mike Leavitt, Administrator
U. S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemicals Right-to-Know Program

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Re: Update and Correction of information contained in the EPA HPV Challenge Program Tracking System website for ***Benzene, 1,4-dichloro (CAS No. 106-46-7)***.

Dear Administrator Leavitt:

The purpose of this letter is to respond to the April 12, 2004 letter from Mr. Charles Auer, Director of EPA's Office of Pollution Prevention and Toxics in which Mr. Auer requested an update PPG's commitment status regarding the chemical ***Benzene, 1,4-dichloro (CAS No. 106-46-7)***. Additionally, we are requesting that the Agency update and correct information currently contained in the **HPV Challenge Summary Report** in the EPA HPV Challenge Program tracking system that is located on the EPA website. Specifically we wish to correct entries concerning PPG sponsorship of this material in the HPV Challenge Program. The specifics of the information to be corrected are as follows:

- The HPV Challenge Program website, contains an **HPV Challenge Summary Report**. In this report there is a listing of various categories of commitments companies and consortia have made to the HPV Challenge Program. In the portion of the website titled ***Full Commitment to the HPV Challenge***, PPG is listed as sponsoring ***Benzene, p-dichloro (CAS No. 106-46-7)***. This information is **not correct**. In the EPA HPV Challenge database this chemical has been assigned an indicator of 2, i.e. *being handled under the OECD SIDS Program*. PPG did **not** volunteer to sponsor this material and specifically notified the Agency in our original commitment letter dated March 11, 1999 that PPG would

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not sponsor this material because it was being handled in the OECD SIDS program. Therefore, reference to PPG sponsorship of this chemical should be removed from this section of the database.

It may be of interest to the Agency that data on ***Benzene, 1,4-dichloro (CAS No. 106-46-7)*** for all endpoints included in the HPV Challenge program were included in the documents submitted by the Chlorobenzene Producers Association (CPA) for the Chlorobenzenes category. As correctly shown in the EPA website, that category included the following chemicals sponsored in the HPV Challenge Program by the CPA and its member companies, including PPG:

<i>In Chlorobenzene Producers Association:</i>		
Monochlorobenzene	108-90-7	2001
m-Dichlorobenzene	541-73-1	2001
1,2,3-Trichlorobenzene	87-61-6	2001
o-Dichlorobenzene	95-50-1	2001

The data on ***Benzene, 1,4-dichloro (CAS No. 106-46-7)*** was included in the documents for this category in order to provide as complete a data set as possible for this family of closely related structural analogues. However, as stated above, PPG did **not** agree to sponsor ***Benzene, 1,4-dichloro (CAS No. 106-46-7)*** in the HPV Challenge Program.

We appreciate the efforts of the Agency to manage the large amount of information from the HPV Challenge Program, and hope that these corrections will help in assuring the accuracy of the information available to the public.

Yours truly,

James A. Barter